

**UNITED STATES BANKRUPTCY COURT**  
**MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michael Anthony Cuff  
**Debtor 1**

Nationstar Mortgage, LLC d/b/a Mr. Cooper  
**Movant(s)**  
v.

Michael Anthony Cuff  
Tabitha A. Bosack (Non-Filing Co-Debtor)  
**Respondent(s)**  
Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 1:21-BK-02542-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No. 26**

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Michael Anthony Cuff, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted.
7. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable the parties.
8. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
9. Paragraph 9 contains a conclusion of law to which no response is required.
10. Denied in part. Debtor(s) are without sufficient knowledge as to the truth of the averment in Paragraph indicating that Movant(s) incurred legal fees; therefore, it is denied. The remaining averments as stated in Paragraph 10 contains a conclusion of law to which no response is required.
11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: April 19, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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2132 Market Street  
Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, April 19, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire